

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CALIFORNIA PUBLIC EMPLOYEES' ) Civ. No. 24-cv-1743 (JMB/DTS)  
RETIREMENT SYSTEM, Individually and )  
on Behalf of All Others Similarly Situated, ) CLASS ACTION  
 )  
Plaintiff, ) DECLARATION OF ROBERT R.  
vs. ) HENSSLER JR. IN SUPPORT OF LEAD  
 ) PLAINTIFF'S REPLY MEMORANDUM  
 ) OF LAW IN FURTHER SUPPORT OF  
 ) ITS MOTION FOR PARTIAL RELIEF  
 ) FROM THE PSLRA DISCOVERY STAY  
 ) TO OBTAIN DOCUMENTS ALREADY  
 ) PRODUCED TO THE DEPARTMENT  
 ) OF JUSTICE  
 )  
UNITEDHEALTH GROUP INC., et al., )  
Defendants. )  
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DATE: February 27, 2025  
TIME: 2:00 P.M. EST  
CTRM: 9E

I, ROBERT R. HENSSLER JR., declare as follows:

1. I am an attorney admitted *pro hac vice* to practice before all of the courts of the State of Minnesota. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, Lead Counsel for California Public Employees' Retirement System in the above-captioned securities class action. I make this declaration in support of Lead Plaintiff's Reply Memorandum of Law in Further Support of its Motion for Partial Relief from the PSLRA Discovery Stay to Obtain Documents Already Produced to the Department of Justice. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto as Exhibit B is a true and correct copy of the following investigative report: *Almost Half of UnitedHealth Group's Revenue Faces Legislative and Regulatory Risk, According to Capitol Forum Analysis*, Capital Forum (Feb. 10, 2025) [Redacted].

3. Attached hereto as Exhibit C is a true and correct copy of the following investigative report: Christopher Weaver Follow & Anna Wilde Mathews, *DOJ Investigates Medicare Billing Practices at UnitedHealth*, Wall St. J. (Feb. 21, 2025).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 26th day of February, 2025, at San Diego, California.

s/ Robert R. Henssler Jr.

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ROBERT R. HENSSLER JR.